

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(Charlotte Division)

In re: _____) Chapter 11
) _____
ACE MOTOR ACCEPTANCE) Case No. 18-30426
CORPORATION,)
)
Debtor.)

OBJECTION TO MOTION FOR RELIEF FROM STAY

Now come the Russell Edward Algood Revocable Trust Dated May 15, 2013, the Janet G. Algood Living Trust, the John G. Algood Living Trust, and the Malvin L. Algood Living Trust (collectively, the “Respondents”) and object to the *Motion by the Sprye Class for Relief from Automatic Stay to Pursue Sprye Class Action in the United States District Court for the District of Maryland* (the “Stay Relief Motion”) [Doc. 205]. The Respondents respectfully request:

- (1) that the Court hold a hearing on the Stay Relief Motion;
- (2) that such hearing be preliminary only;
- (3) that the stay continue in effect pending the conclusion of a final hearing pursuant to 11 U.S.C. § 362(e)(1);¹
- (4) that the Stay Relief Motion be denied;
- (5) alternatively, in the event the Stay Relief Motion is allowed, that the 14-day stay set forth in Bankruptcy Rule 4001(a)(3) not be waived; and
- (6) that the Court grant such other relief as is just and proper.

¹ The Respondents note that the Stay Relief Motion does not contain a request to invoke 11 U.S.C. § 362(e) and the same is therefore waived. *L.R. 4001-1(b)*. Nevertheless, the Respondents address its application in this objection out of an abundance of caution.

Dated: Charlotte, North Carolina
August 9, 2019

MOON WRIGHT & HOUSTON, PLLC

/s/ Richard S. Wright

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing ***Objection to Motion for Relief from Stay*** was served by electronic notification on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case on the date shown below.

Dated: Charlotte, North Carolina
August 9, 2019

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